

Exhibit G

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: DunJeanetta Darling, as next of friend and mother of one minor child, S.D., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. DunJeanetta Darling has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: S.D. – [REDACTED] 2011

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

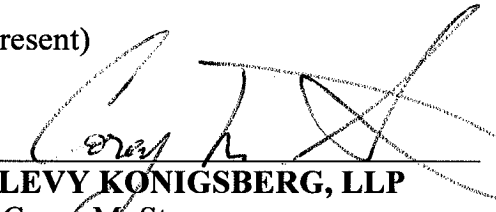
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Dustin Wefel, as next of friend and father of three minor children, C.B., L.W. and L.G., [REDACTED] Swartz Creek, MI 48473, claimant's counsel can be contacted at 212-605-6200. Dustin Wefel has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: C.B. – [REDACTED] 2012, L.W. – [REDACTED] 2010, L.G. – [REDACTED] 2009

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

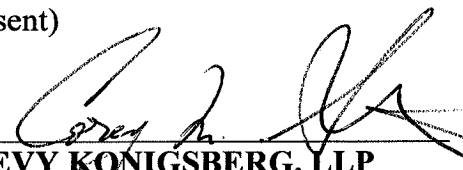
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
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- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

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 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

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ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Earthly Upchurch, as next of friend and father of four minor children, K.U., S.U. 1, S.U. 2 and T.U., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Earthly Upchurch has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: E.U. – [REDACTED] 2002, K.U. – [REDACTED] 2006, S.U.1 – [REDACTED] 2011, S.U.2 – [REDACTED] 2007, T.U. – [REDACTED] 2013

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

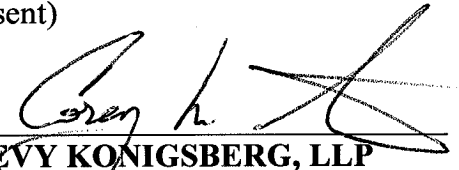
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
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- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
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 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
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 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 8000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 8000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
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14. Date of Signature: 4/20/2017

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ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Ebony Hall, as next of friend and mother of two minor children, A.M. 1 and A.M. 2, [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Ebony Hall has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.M.1 – [REDACTED] 2011, A.M.2 – [REDACTED] 2015

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

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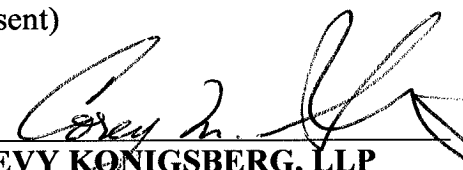
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

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 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Edsel Sanders, as next of friend and father of one minor child, T.S., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Edsel Sanders has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: T.S. – [REDACTED] 2013

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

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12. A. Property Damage Claim: None
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STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Edward Edelen, as next of friend and father of three minor children, J.E. 1, J.E. 2, and P.E., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Edward Edelen has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.E.1 – [REDACTED] 2004, J.E.2 – [REDACTED] 2005, P.E. – [REDACTED] 2012

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

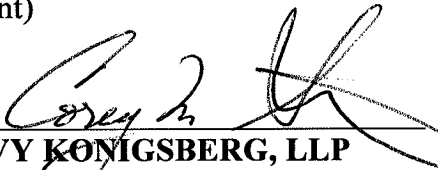
8. Basis of Claim: Negligence. The SF-95 required details are described below.

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10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

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- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Emma Cunningham, as next of friend and mother of three minor children, A.B., C.B. and Z.B., [REDACTED] Flint, MI 48532, claimant's counsel can be contacted at 212-605-6200. Emma Cunningham has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.B. – [REDACTED] 2008, C.B. – [REDACTED] 2006, Z.B. – [REDACTED] 2007

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
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- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Eric Hunter Sr., as next of friend and father of one minor child, R.H., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Eric Hunter Sr. has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: R.H. – [REDACTED] 2000

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

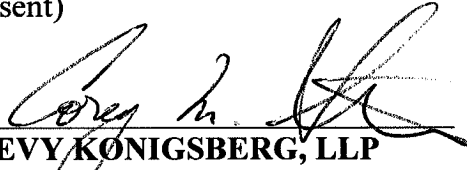
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Eric Moore, as next of friend and father of one minor child, E.M., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Eric Moore has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: E.M. – [REDACTED] 2012

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

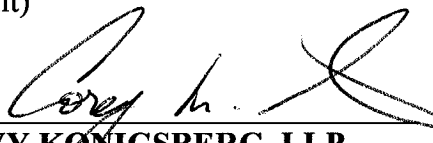
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Eric Tillman, as next of friend and father of three minor children, E.T., J.S. and J.T., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Eric Tillman has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: E.T.1 – [REDACTED] 2011, E.T.2 – [REDACTED] 2016, J.S. – [REDACTED] 2005, J.T. – [REDACTED] 2013

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

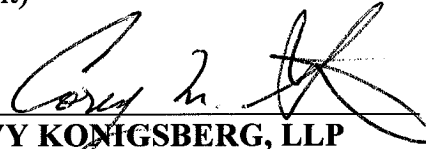
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
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- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
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- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
 - q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Erika Jenkins, as next of friend and mother of three minor children, A.J., J.J. and K.D., [REDACTED] Flint, MI 48532, claimant's counsel can be contacted at 212-605-6200. Erika Jenkins has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.J. – [REDACTED] 2004, K.D. – [REDACTED] 2001, J.J. – [REDACTED] 2007

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
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- e. Thomas Poy, Ground Water and Drinking Branch Region 5
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- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
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- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
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 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Erin Nord, as next of friend and mother of one minor child, J.C., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Erin Nord has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.C. – [REDACTED] 2008

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

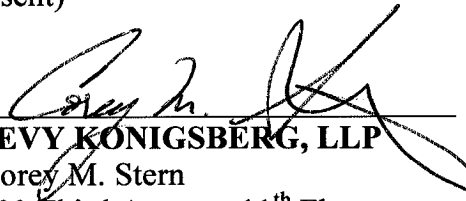
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Euleen Thorton, as next of friend and mother of seven minor children, A.W., C.W., D.W., E.W., J.W., N.S. and R.W., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Euleen Thorton has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: R.W. – [REDACTED] 2012, D.W. – [REDACTED] 2014, A.W. – [REDACTED] 2009, E.W. – [REDACTED] 2004, J.W. – [REDACTED] 2006, C.W. – [REDACTED] 2011, N.S. – [REDACTED] 2016

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
 - q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 14000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 14000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Euridice Sykes, as next of friend and mother of one minor child, K.B., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Euridice Sykes has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: K.B. – [REDACTED] 2000

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Evelyn Jackson, as next of friend and mother of one minor child, C.R., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Evelyn Jackson has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: C.R. – [REDACTED] 2006

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
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- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
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- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
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- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Felicia Smith, as next of friend and mother of one minor child, J.S., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Felicia Smith has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.S. – [REDACTED] 2004

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

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- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
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- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
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- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
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- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
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- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Francine Boone, as next of friend and legal guardian of one minor child, K.B., [REDACTED] Burton, MI 48529, claimant's counsel can be contacted at 212-605-6200. Francine Boone has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: K.B. – [REDACTED] 2004

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

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- e. Thomas Poy, Ground Water and Drinking Branch Region 5
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- g. Darren Lytle, Office of Research and Development, Region 5
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- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
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- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
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- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
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 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
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New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Fredrick Brown, as next of friend and father of one minor child, S.B., [REDACTED] Flint, MI 48506, claimant's counsel can be contacted at 212-605-6200. Fredrick Brown has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: S.S. – [REDACTED] 2003

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

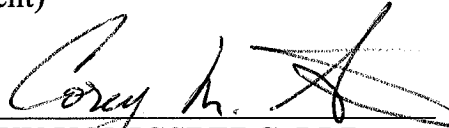
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Fredrik Bell, as next of friend and father of one minor child, A.B., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Fredrik Bell has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.B. – [REDACTED] 1999

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

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- g. Darren Lytle, Office of Research and Development, Region 5
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Gabriel Wilson, as next of friend and mother of one minor child, L.D., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Gabriel Wilson has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: L.D. – [REDACTED] 2008

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

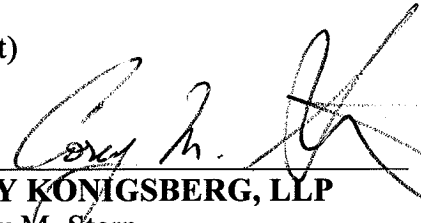
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
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 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Gabrielle McClain, as next of friend and mother of two minor children, K.W.1 and K.W.2, [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Gabrielle McClain has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: K.W.1 – [REDACTED] 2013, K.W.2 – [REDACTED] 2014

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
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 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Gabrielle Miguel, as next of friend and mother of five minor children, A.M., J.M.1, J.M.2, J.M.3. and M.M., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Gabrielle Miguel has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.M. – [REDACTED] 2006, J.M.1 – [REDACTED] 2015, J.M.2 – [REDACTED] 2011, J.M.3 – [REDACTED] 2009, M.M. – [REDACTED] 2013

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

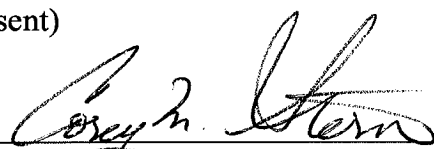
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

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 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 10000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 10000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
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**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Gail Woodel, as next of friend and mother of one minor child, E.W., [REDACTED] Flint, MI 48506, claimant's counsel can be contacted at 212-605-6200. Gail Woodel has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: E.W. – [REDACTED] 2001

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

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12. A. Property Damage Claim: None
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- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
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800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Gardell Haralson, as next of friend and father of one minor child, A.H., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Gardell Haralson has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.H. – [REDACTED] 2015

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: General Tyler, as next of friend and father of seven minor children, A.T., B.T., C.T. 1, C.T. 2, C.T. 3, G.T. and J.D., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. General Tyler has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.T. – [REDACTED] 2008, B.T. – [REDACTED] 2009, C.T.1 – [REDACTED] 2003, C.T.2 – [REDACTED] 2004, C.T.3 – [REDACTED] 2007, G.T. – [REDACTED] 2014, J.D. – [REDACTED] /2006

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
 - q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 14000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 14000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Geneva Cook, as next of friend and mother of two minor children, A.S. and I.B., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Geneva Cook has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.S. – [REDACTED] 2011, I.B. – [REDACTED] 2015

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Gerald Ware, as next of friend and father of four minor children, R.W., G.F., H.F. and J.F., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Gerald Ware has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: G.F. – [REDACTED] 2004, H.F. – [REDACTED] 2005, J.F. – [REDACTED] 2009, R.W. – [REDACTED] 2014

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

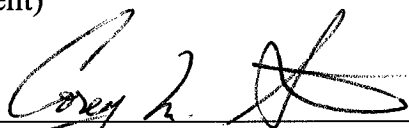
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
 - q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 8000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 8000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Gilbert Reyna, as next of friend and father of three minor children, V.R., G.R.1 and G.R.1 and G.R.2, [REDACTED] Flint, MI 48506, claimant's counsel can be contacted at 212-605-6200. Gilbert Reyna has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: G.R.1 – [REDACTED] 2011, G.R.2 – [REDACTED] 2004, V.R. – [REDACTED] 2014

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
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- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Gladys Beal, as next of friend and mother of two minor children, K.J. and Z.J., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Gladys Beal has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: K.J. – [REDACTED] 2007, Z.J. – [REDACTED] 2006

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
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- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
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- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

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 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Gloria Perry-Walker, as next of friend and mother of three minor children, A.T., J.H. and J.P., [REDACTED] Fushing, MI 48433, claimant's counsel can be contacted at 212-605-6200. Gloria Perry-Walker has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.T. – [REDACTED] 2015, J.H. – [REDACTED] 2013, J.P. – [REDACTED] 2012

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

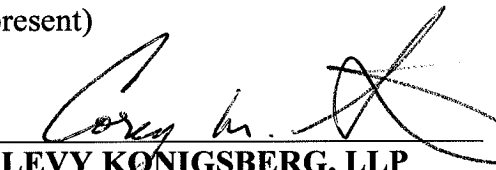
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Gloria Spearman, as next of friend and mother of one minor child, B.S., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Gloria Spearman has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: B.S. – [REDACTED] 2000

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Goldie Alomar, as next of friend and mother of two minor children, G.A.1 and G.A.2, [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Goldie Alomar has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: G.A.1 – [REDACTED] 2006, G.A.2 – [REDACTED] 2004

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Grace Taylor, as next of friend and mother of two minor children, A.M. and J.L., [REDACTED] Flint, MI 48506, claimant's counsel can be contacted at 212-605-6200. Grace Taylor has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.M. – [REDACTED] 2003, J.L. – [REDACTED] 2013

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Gwendalyn Collins, as next of friend and mother of one minor child, R.C., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Gwendalyn Collins has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: R.C. – [REDACTED] 2004

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

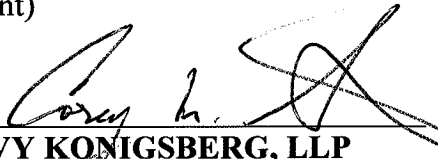
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Hazel Brown, as next of friend and mother of one minor child, J.B., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Hazel Brown has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.B. – [REDACTED] 1999

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Heather Eastman, as next of friend and mother of one minor child, A.E., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Heather Eastman has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.E. – [REDACTED] 2012

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Heather Lay Marve, as next of friend and mother of one minor child, N.L., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Heather Lay Marve has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: N.L. – [REDACTED] 2010

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

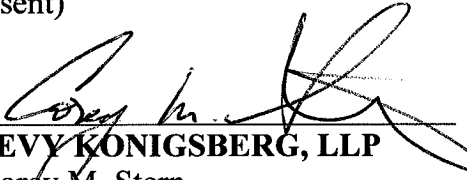
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Hebony Caldwell, as next of friend and mother of one minor child, F.R., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Hebony Caldwell has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: F.R. – [REDACTED] 2003

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

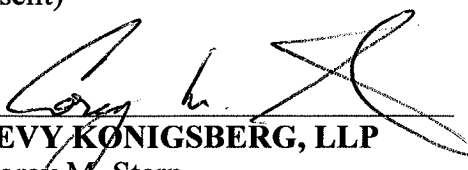
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Hesna McFarland, as next of friend and mother of one minor child, M.I., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Hesna McFarland has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: M.I. – [REDACTED] 1999

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Hollie Maguire, as next of friend and mother of one minor child, L.M., [REDACTED] Lapeer, MI 48446, claimant's counsel can be contacted at 212-605-6200. Hollie Maguire has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: L.M. – [REDACTED] 2005

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
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- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
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- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Ikea Tillis, as next of friend and mother of one minor child, S.T., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Ikea Tillis has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: S.T. – [REDACTED] 2014

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
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- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Irving Crowder, as next of friend and father of three minor children, C.C., D.C., and I.C., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Irving Crowder has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: D.C. – [REDACTED] 2002, C.C. – [REDACTED] 2011, I.C. – [REDACTED] 2006

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Iyana Al-Amin, as next of friend and mother of two minor children, D.A. and J.S., [REDACTED] Mount Morris, MI 48458, claimant's counsel can be contacted at 212-605-6200. Iyana Al-Amin has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: D.A. – [REDACTED] 2008, J.S. – [REDACTED] 2013

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jackie Putney, as next of friend and mother of two minor children, B.G. and J.L., [REDACTED] Flint, MI 48506, claimant's counsel can be contacted at 212-605-6200. Jackie Putney has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: B.G. – [REDACTED] 2015, J.L. – [REDACTED] 2013

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jacobi Gaines, as next of friend and mother of one minor child, J.G., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Jacobi Gaines has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.G. – [REDACTED] 2013

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jacqueline Weaver, as next of friend and legal guardian of one minor child, T.W., [REDACTED] Mount Morris, MI 48458, claimant's counsel can be contacted at 212-605-6200. Jacqueline Weaver has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: T.W. – [REDACTED] 2014

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jacqueline Clark, as next of friend and mother of two minor children, A.E. and N.C., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Jacqueline Clark has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: N.C. – [REDACTED] 2005, A.E. – [REDACTED] 2007

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

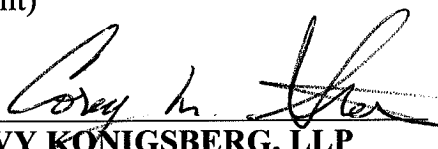
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jacquelyn Douglas, as next of friend and mother of one minor child, J.M., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Jacquelyn Douglas has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.M. – [REDACTED] 2006

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
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- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/20/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jada McClain, as next of friend and mother of one minor child, D.W., [REDACTED] Davidson, MI 48423, claimant's counsel can be contacted at 212-605-6200. Jada McClain has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: D.W. – [REDACTED] 2014

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

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8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
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- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
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- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
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**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jamanda Ross, as next of friend and mother of four minor children, J.R.1, J.R.2, J.R.3 and J.R.4, [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Jamanda Ross has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.R.1 – [REDACTED] 2010, J.R.2 – [REDACTED] 2008, J.R.3 – [REDACTED] 2015, J.R.4 – [REDACTED] 2006

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

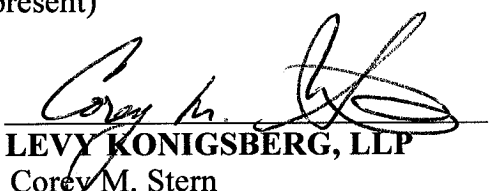
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

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- g. Darren Lytle, Office of Research and Development, Region 5
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- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
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 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 8000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 8000000 (at present)
13. A. Signature of duly authorized agent: 
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